

EXHIBIT B

Bonner, Kelly

From: Adam Slater <ASlater@mazieslater.com>
Sent: Monday, November 23, 2020 12:45 PM
To: Priselac, Jessica; Christopher Geddis; Goldberg, Seth A.; Ferretti, Joseph S.
Cc: Cheryll Calderon; Schwartz, Barbara; Hill, Coleen W.; Conlee Whiteley; 'dnigh@levinlaw.com'; Honik, Ruben
Subject: Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Thank you Jessica. We will do so and then you will have the defined period under the PO to move to confirm confidentiality or they will be de-designated by operation of the PO. We look forward to your explanation for why these documents deserve to be maintained as confidential.

Adam Slater

From: Priselac, Jessica
Sent: Monday, November 23, 2020 12:41 PM
To: Christopher Geddis ; Goldberg, Seth A. ; Ferretti, Joseph S.
Cc: Adam Slater ; Cheryll Calderon ; Schwartz, Barbara ; Hill, Coleen W.
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel:

We do not agree to your filing these documents on ECF. You have not followed the Protective Order with regard to challenging their confidentiality, nor have you provided us with sufficient time to evaluate your request. Also, as ZHP's products were recalled more than two years ago, there is no public safety concern. You may email these documents to Judge Schneider, in connection with filing your submission.

Best regards,

Jessica Priselac
Attorney at Law

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From: Christopher Geddis
Sent: Monday, November 23, 2020 10:24 AM

To: Priselac, Jessica ; Goldberg, Seth A. ; Ferretti, Joseph S.

Cc: Adam Slater ; Cheryll Calderon

Subject: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

We will be using the following documents as exhibits to the agenda letter regarding the November 24, 2020 Case Management Conference.

- (1) ZHP00305868 – Audit observations regarding deviations involving both USP and Ch. P valsartan.
- (2) ZHP00385769 – Deviation Investigation Report stating, among other things, that ZHP told foreign regulatory agencies different things at different times.
- (3) ZHP00479762 – Communications between ZHP and Glenmark Pharmaceuticals Limited regarding unknown peaks in ZHP's valsartan.
- (4) ZHP00493010 – Communications between ZHP and Vertex regarding unknown peaks in ZHP's valsartan.
- (5) ZHP00423144 – Email between ZHP and Ranbaxy regarding ZHP's failure to monitor genotoxic impurities and the manufacturing of CEP and USP valsartan.

There is nothing about the documents that justifies treatment as confidential under the protective order, especially in light of the public health interests involved. Does ZHP consent to Plaintiffs filing these documents as attachments to its letter? Please let us know by noon in order to avoid burdening us or the Court.

Best.

Chris

Christopher J. Geddis

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